

Comments OPPOSED to RM-10740

The Petitioners mention two different groups in their introduction. One group has begun experimenting with what they refer to as “high-fidelity” audio. The other group apparently is adjusting their equipment “to splatter purposely”. I believe that these two situations need to be treated separately.

To adjust one’s equipment to “splatter” is against the Commission’s rules today. Mr. Hollingsworth and the Commission are justified in seeking to curtail this type of intentional interference. No Amateur operator condones this type of behavior. This Petition would not stop this type of willful interference. No matter how far you restrict audio frequencies, a poorly adjusted linear amplifier can produce “splatter”. If the Petitioners believe that an audio bandwidth restriction will stop this type of interference, then the Petition is based on a false premise.

The Petitioners call your attention to a web page with the URL of www.nu9n.com. If you will examine the rest of the web page and not just the supplied portion, you will note that NU9N repeatedly refers to transmitting a clean signal that is not over-modulated and free from IMD products that cause splatter. NU9N advocates responsible experimentation *when band conditions and low usage permit*. This seems, in my mind, to be within the “good amateur practice” and experimentation parameters of the radio hobby. Under these conditions, I feel that the Petitioners are not justifying their request for bandwidth limitations.

The Petitioners discuss AM modulation in their Petition. They state that AM “does not create the same problems” as the “Hi Fi Sideband” creates. One then wonders why AM is mentioned in the Petition at all. If AM is not a problem, I would ask that any references to AM be removed from the Petition.

In the section for suggested standards, a bandwidth of 2.8 kHz for SSB and 5.6 kHz for AM is proposed. There is no standard measurement procedure referenced. How many dB down must the audio frequencies be above 2.8 and 5.6 kHz? How is this measured? The Petitioners do not answer these questions in the Petition. Additionally, the issue of having specific standards, rather than today’s easier-to-discern observation of “good practice” and avoiding interference, would raise a difficult technical dilemma for both the establishment of valid complaints and from an enforcement perspective. The petition includes a copy of an advisory letter to several SSB operators regarding complaints of interference from FCC Enforcement Counsel Riley Hollingsworth, who noted, in part, that “precise measurements of bandwidth may be somewhat complex and the reception of a signal depends, somewhat on the engineering characteristics of the receiver.” A mandatory bandwidth standard could consequently encourage complaints that are well-meaning but unfounded.

The Petitioners state in a latter section that a simple low pass audio circuit can be fitted to older transmitters that do not meet the proposed standards. Even if a proper filter is used, the Petitioners agree in the Petition that an audio filter will not guarantee compliance with the proposed standard. This technically renders older equipment illegal.

In my opinion, the Petition is flawed from the start. The Petition, if adopted, will not stop the intentional interference referenced, seeks to restrict experimentation and seeks to restrict a method of modulation (AM) that the Petitioners themselves say is not a problem. The Petition is technically flawed in that the proposed standards are not spelled

out to a sufficient degree. The proposed remedy for older transmitters, the low pass audio circuit, is not a solution at all.

I would ask that this Petition be denied.

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